

EXHIBIT K

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SINGH, HARBHAJAN,

Petitioner,

v.

WILLIAM BARR, *et al.*,

Respondents.

Case No. C19-0414

DECLARATION OF RYAN M.
JENNINGS

I, Ryan M. Jennings, do declare as follows:

1. I am employed as a Deportation Officer assigned to the Office of Enforcement and Removal Operations ("ICE-ERO"), of the U.S. Immigration and Customs Enforcement ("ICE"), United States Department of Homeland Security, Tacoma, Washington.
2. This declaration is based upon my personal knowledge and information obtained by me in the course of my official duties at ICE-ERO.
3. I am familiar with the case of Petitioner Harbhajan Singh. In addition to my knowledge of this case as the assigned Deportation Officer, I have reviewed Petitioner's file and information obtained from ICE databases.
4. My present duties include acting as a liaison with the Embassy of India concerning the repatriation of Indian nationals who are detained in the State of Washington and who have been

1 ordered removed from the United States. In my current position, I am personally familiar with
2 inter- and intra-government procedures for the repatriation of persons who are natives of India.

3 5. On June 5, 2008, Mr. Singh failed to appear before an Immigration Judge and was
4 subsequently ordered removed in absentia to India.

5 6. On June 26, 2018, Mr. Singh was transferred from South Correctional Entity jail to the
6 administrative custody of ICE-ERO at the Northwest Detention Center in Tacoma, WA. to
7 facilitate his removal.

8 7. On or around July 13, 2018, ICE-ERO made a formal request to the Embassy of India for
9 a travel document for Mr. Singh. A travel document for Mr. Singh will allow him to travel to
10 India. The Consulate of India referred the request to the Ministry of India for verification of
11 national identity.

12 8. On October 30, 2018, ICE served Mr. Singh with a Decision to Continue Detention.

13 9. On December 4, 2018, the Consulate General of India stated local Indian authorities were
14 attempting to verify Mr. Singh's identity.

15 10. On December 28, 2018, ERO contacted ICE HQRIO requesting assistance in obtaining a
16 travel document.

17 11. On January 16, 2019, Mr. Singh was served with a 180-day custody review decision to
18 remain in ICE custody.

19 12. On March 13, 2019, the Vice Consul for India in San Francisco stated there were delays
20 on many Indian travel document request due to a heavy workload. Mr. Singh's travel document
21 remained pending.

22 13. In a meeting on March 28, 2019, the Vice Consul for India in San Francisco informed the
23 ERO liaison, DO Ethel Balayan, that nationality verification was still pending.
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1 14. As India had to send Mr. Singh's information to India for verification, it can delay the
2 travel document longer than if the consulate at the United States had been able to verify it. This
3 delay is not unusual or unexpected for these types of cases, and it typically takes 12 months for a
4 travel document to issue from India where the alien's information must be sent to India for
5 verification.

6 15. India is still issuing travel documents, including for similarly situated individuals as Mr.
7 Singh.

8 16. ICE-ERO has provided all requested information and based on other similar cases, I
9 expect that the Embassy of India will issue a travel document within the next three months. To
10 the best of my knowledge, there are no barriers that would prevent ICE from removing Petitioner
11 to India once the travel document is received. Consequently, Petitioner's removal to India is
12 significantly likely to occur within the reasonably foreseeable future.

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14 17. Mr. Singh is considered a flight risk because he was previously issued an order of
15 removal, but he did not depart the United States as ordered.

16 I declare under penalty of perjury that the foregoing is true and correct to the best of my
17 information, knowledge and belief, and based on records maintained in the regular course of
18 business.

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20 Executed on April 25, 2019 at Tacoma, Washington.

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23 Ryan M. Jennings
24 Deportation Officer, ICE-ERO
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